Comments on the Draft EIS and Responses

FEDERAL AGENCIES

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

IN REPLY REFER TO
ER05/185

Electronically Filed

April 12, 2005

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Re: COMMENTS – Review of Draft Environmental Impact Statement (DEIS) for the Northwest Pipeline Corporation, Capacity Replacement Project, (Docket Nos. CP05-32-000, -001), Whatcom, Skagit, Snohomish, King, Pierce, Lewis, Clark, and Thurston Counties, Washington

Dear Ms. Salas:

FA1-1 The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Northwest Pipeline Corporation, Capacity Replacement Project, Whatcom, Skagit, Snohomish, King, Pierce, Lewis, Clark, and Thurston Counties, Washington. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Preston A. Sleeger
Regional Environmental Officer

FA1-1 Thank you for your comment.

DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT AGENCY
HEADQUARTERS, UNITED STATES ARMY GARRISON-FORT LEWIS
BOX 339500, MAIL STOP 17
FORT LEWIS WASHINGTON 98433-9500

April 25, 2005

Public Works

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Reference: Docket Nos. CP05-32-000, -001
Capacity Replacement Project
Comments on the Draft Environmental Impact Statement

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) issued March 2005 to modify the Northwest Pipeline Corporation's existing natural gas transmission pipeline system between Sumas and Washougal, Washington. We reviewed the document for issues that pertain to the Fort Lewis military installation (Fort Lewis) located between mileposts 1335.2 and 1330.6, encompassing 4.6 miles of the Fort Lewis Pipeline Loop. This project involves construction and operation of a new 36-inch-diameter pipeline and abandonment of the 26-inch-diameter pipeline, traversing both Muck and South Forks Creeks at Fort Lewis.

The Fort Lewis Public Works Environmental and Natural Resources Division (ENRD) provide the following comments on the DEIS:

1) Soils

FA2-1 a) Page 4-17, Table 4.2.1-1, titled *Soil Limitations Along the Loops Associated with the Capacity Replacement Project*: The table discloses a lack of information for Fort Lewis on soil compaction, flooding hazard, shallow bedrock, and prime farmland. However, the following two pages in the DEIS state that there is potential for soil compaction and that the area is not likely to be prime farmland.

FA2-2 b) Page 4-23. Mowing of Scotch broom shall occur only prior to seed production to prevent expansion of this noxious weed. All subsoil for this project that is placed over the existing 26-inch and 30-inch pipeline must be completely removed and the work area revegetated with native plant material. Nitrogen fertilizer and/or wood chips are not to be applied on Fort Lewis unless authorized in writing (Deborah Johnston 253 966-1764).

FA2-3 c) Page 4-26. Clean soils must meet the NOAA constituent limits of the Screening Quick Reference Tables (SQuiRTs).

FA2-4 d) Page 4-27. Pipe storage and contractor yards on Fort Lewis must be revegetated with native plant material.

2) Water Resources

a) Ground Water Resources

FA2-1 As indicated in footnote "d" in table 4.2.1-1, regional data available for the soils within Fort Lewis provided insufficient information to make a definitive determination of the presence or absence of a number of the soil limitations addressed in the table. The discussion of each soil limitation in section 4.2.1 contains information regarding the potential to encounter each limitation along the route across Fort Lewis.

FA2-2 Section 4.2.2 has been revised to include a discussion regarding Northwest's proposal to prepare a site-specific Erosion Control and Revegetation Plan (ECR Plan) for Fort Lewis. Northwest would provide a copy of its site-specific ECR Plan for Fort Lewis to Fort Lewis personnel before the start of construction on the military reservation. The revised section 4.2.2 includes the FERC staff's recommendation that Northwest file its site-specific ECR Plan and documentation of Fort Lewis' concurrence with the plan with the Secretary before construction on the military reservation (see also mitigation measure number 12 in section 5.4). In addition, section 4.5.2 has been revised to include information regarding reclamation/revegetation that would be included in Northwest's site-specific ECR Plan for Fort Lewis.

FA2-3 Section 4.2.3 has been revised to include Fort Lewis' stipulation regarding replacement soils and to include the FERC staff's recommendation that Northwest file a revised SPCC Plan for activities on Fort Lewis and documentation of Fort Lewis' concurrence with the plan with the Secretary before construction on the military reservation (see also mitigation measure number 13 in section 5.4).

FA2-4 None of Northwest's proposed pipe storage and contractor yards are located on Fort Lewis.

FA2-5 i) Pages 4-33, 4-84, and 4-125. Fort Lewis regulations have established wetland and waterbody buffers for activities on the installation. The DEIS designates buffer sizes different from those established at Fort Lewis. Use the established Fort Lewis buffers.
(1) The Fort Lewis wetland and waterbody buffers are:
(a) Fifty (50) meters for all off-road vehicle travel and any digging activities.
(b) One hundred (100) meters for assembly areas, to include construction lay-down yards, vehicle parking areas, and refueling sites.

FA2-6 ii) Page 4-34. Concrete coating activities shall not occur within 50 meters of a wetland.

FA2-7 iii) Page 4-35. Appendix B shows that water used for hydrostatic testing will not be taken from waterbodies on Fort Lewis as part of this project. If water removed for hydrostatic testing were to occur on Fort Lewis, notify the Fort Lewis ENRD at least 48 hours prior to beginning the testing (Deborah Johnston).

b) Surface Water Resources

FA2-8 i) Section 4.3.2. As discussed at the Fort Lewis Deconfliction meeting with Northwest Pipeline, Williams Pipeline and the Federal Energy Regulatory Commission on August 4, 2004 a Washington State stormwater permit prepared for this project will suffice for Fort Lewis. However, if a Washington State stormwater permit is not prepared for this project, Fort Lewis will require a storm water pollution prevention plan for the portion of the line that crosses Fort Lewis (Shannon Peterson 253 966-1795).

ii) Waterbody construction and mitigation procedures.

FA2-9 (1) Information regarding stream crossing mitigation procedures for Muck and South Creeks was provided in an e-mail sent from Hibba Wahbeh, Anteon Corporation to Tim Powell, Williams Pipeline Company on February 25, 2005. A portion of the e-mail is replicated below. Please include this information in place of:
(a) Page 4-48. Replace the bullet that states "placing 12 inches of clean gravel over the trenchline in all waterbodies with fisheries resources before returning flow to the construction work area"
(b) Page 4-52. Third full paragraph starting with "Fort Lewis requested..."

Portion of the e-mail sent to Williams Pipeline, as mentioned above:

It is important that the appropriate sealant (clay) be placed not less than 24" deep (not counting the finish substrate that will overlay it) to maintain the creek's water quantity and quality to current or better levels. Minimum permeability standards for the clay are not to be lower than $1x10^{-6}$. The recommended substrate overlaying the sealant includes a layer of filter fabric and spawning gravel to a depth of about 1.5 feet. The spawning gravel size and mixture appropriate for trout (0.25 to 0.5 inch gravel composing approximately 60% of the mix with the remaining 40% composed of gravel 1.5 to 2 inches in size). Resident cutthroat trout is known to exist in that section of the creek. The finished grade, including substrate, should match the existing streambed elevation.

As mentioned in previous discussions, we recommend that flow data for both Muck and South Creeks be taken prior to implementation of the project to establish baseline flow data above and below the project site, and then collected for one year following the completion of the pipeline project. If the data collected shows a net loss of flow over the project site, then additional remedial actions will be taken as necessary to prevent continued loss of flow.

Page 2 of 6

FA2-5 Sections 4.3.1.2, 4.3.2.2, 4.4.3, and 4.6.2.3 have been revised to discuss Fort Lewis' comments regarding wetland and waterbody buffers. Northwest would prepare a site-specific ECR Plan for Fort Lewis that would incorporate Fort Lewis' requirements regarding erosion control and restoration and would provide the plan to Fort Lewis for approval before construction on the military reservation. In section 4.2.3, the FERC staff has recommended that Northwest prepare a revised SPCC Plan for activities on Fort Lewis. The FERC staff has recommended that the site-specific ECR Plan for Fort Lewis, the revised SPCC Plan, and documentation of Fort Lewis' concurrence with the plans be filed with the Secretary before construction on the military reservation (see also mitigation measure numbers 12 and 13 in section 5.4). See also the response to comment FA2-2.

FA2-6 See the response to comment FA2-5.

FA2-7 Northwest has not indicated plans to withdraw hydrostatic test water from any surface waters other than the Centralia Canal; therefore, the Centralia Canal is the only surface water source of hydrostatic test water that is discussed in the EIS. The FERC staff suggests that the requirement to notify Fort Lewis at least 48 hours before beginning hydrostatic testing if the water source were located on the military reservation be included as a stipulation of the amended real estate agreement between Northwest and Fort Lewis.

FA2-8 After the August 4, 2004 meeting between the FERC, Fort Lewis, and Northwest representatives, WDOE staff stated that the WDOE does not consider that it has the jurisdiction to issue the stormwater discharge permit to cover activities on Fort Lewis. The WDOE participated as a cooperating agency in the preparation of the EIS and was responsible for preparing the information related to stormwater permits that is included in the EIS (see section 1.5.1 and table 1.5-1).

FA2-9 Section 4.3.2.2 lists general measures included in the FERC staff's Wetland and Waterbody Construction and Mitigation Procedures (Procedures) and Northwest's plans. Section 4.3.2.2 has been revised to state that some of the measures listed in the section would be subject to change by federal, state, and local permits and approvals (e.g., Fort Lewis' real estate agreement amendment and the WDFW's Hydraulic Project Approval) if determined not to be appropriate at certain locations. Section 4.3.2.2 includes a cross-reference to section 4.3.2.3 for Fort Lewis' specific stipulations regarding the crossings of Muck and South Fork Creeks. Fort Lewis' stipulations regarding advanced notification, restoration, streamflow data, treatment of captured salmonids, turbidity limits, and routine vegetation clearing at Muck and South Fork Creeks, as well as a statement that Northwest has agreed to adhere to the stipulations unless prohibited by other permits (e.g., the WDFW's Hydraulic Project Approval), are included in the revised section 4.3.2.3. The revised section 4.3.2.3 also states that the WDFW commented that it would not allow Northwest to use a filter fabric streambed liner.

3) Wetlands

FA2-10 a) Page 4-89. Mitigation of wetlands at Fort Lewis shall be on-site and in-kind.

4) Vegetation

FA2-11 a) Pages 4-22, 4-46 to 4-49. Fort Lewis lands will be revegetated using only native seeds and plants.

FA2-12 b) Page 4-96. Impacts to grassland/herbaceous vegetation would be long-term (not short-term as stated in the document) and generally would take at least 10 years to establish.

FA2-13 c) Page 4-97. Mowing of Scotch broom shall occur only prior to seed production. Do not apply fertilizer on Fort Lewis lands.

FA2-14 d) Page 4-98. Re-planting of forested areas must comply with the Forestry Management Plan (Allan Derickson 253 967-1740). Do not apply wood chips on Fort Lewis.

FA2-15 e) Page 4-100 to 101. The seed mixtures identified in Table 4.5.2-2 are not authorized for use at Fort Lewis. Specific seed and riparian plantings will be developed for this project (Inger Gruhn 253 967-1549).

FA2-16 f) Pages 4-102 and 4-150. Oregon white oak woodland habitat is a Priority Habitat. Oak trees removed due to construction will be either transplanted to the landfill restoration site or replaced at a 5:1 ratio of 15-gallon stock.

FA2-17 g) Page 4-106. All chemical usage (herbicides, pesticides, insecticides, etc.) must be authorized and reported (as pounds of active ingredient) to the Fort Lewis Installation Pest Manager (Deborah Johnston).

5) Wildlife and Aquatic Resources

FA2-18 a) Page 4-110. Impacts on grassland/herbaceous habitat would be significant as the recovery of disturbed sites is slow and long-term.

FA2-19 b) Page 4-117 to -118. Include Muck Creek and South Fork Creek timing information in Table 4.6.2-2, titled *Approximate Timing of Life Phases for Anadromous Salmonids within Water Resource Inventory Areas (WRIAs) Crossed by the Capacity Replacement Project.*

FA2-20 c) Page 4-124. Large woody debris (LWD) from Fort Lewis may not be removed off-site unless authorized in writing from the Chief of the Forestry Branch of Public Works (Allan Derickson).

FA2-21 d) Pages 4-126, and 4-139 to -140. The Nisqually River supports bull trout. Contact the U.S. Fish and Wildlife Service for the most current data.

FA2-22 e) Page 4-126 to 4-127. An additional mitigation measure will be added in the Aquatic Resources section. Northwest is to identify and photograph all salmonids captured during construction of the stream crossing at Muck and South Fork Creeks and provide this data to the Fort Lewis biologist (Dave Clouse 253 967-3474).

6) Special Status Species

FA2-23 a) Page 4-129 and 4-141. Update the information on critical habitat for salmon based on the most recent description in the Federal Register.

FA2-24 b) Page 4-133. Refer to Fort Lewis Regulation 420-5, *Procedures for the Protection of State and Federally Listed Threatened, Endangered, Candidate Species,*

FA2-10 Section 4.4.3 has been revised to include information regarding mitigation for wetlands that would be crossed on Fort Lewis. See also the response to comment FA2-5.

FA2-11 Section 4.5.2 has been revised to include Fort Lewis' stipulation that all disturbed areas on the military reservation be revegetated using only native species. See also the response to comment FA2-2.

FA2-12 Section 4.5.2 has been revised to include additional information regarding long-term impacts on native grasslands on Fort Lewis.

FA2-13 Section 4.5.2 has been revised to include Fort Lewis' stipulation that mowing of scotch broom only be conducted before seed production and that no fertilizer be applied on Fort Lewis. See also the response to comment FA2-2.

FA2-14 Section 4.5.2 has been revised to include Fort Lewis' stipulation that replanting of forested areas comply with the Forestry Management Plan. Section 4.2.2 has been revised to include Fort Lewis' stipulation that wood chips not be applied on the military reservation. See also the response to comment FA2-2.

FA2-15 Section 4.5.2 has been revised to include Fort Lewis' stipulation that specific seed and riparian plantings be developed for the military reservation. See also the response to comment FA2-2.

FA2-16 Sections 4.5.2 and 4.5.3 have been revised to include Fort Lewis' requirements for oak tree mitigation. See also the response to comment FA2-2.

FA2-17 Section 4.5.2 has been revised to include Fort Lewis' stipulation that any chemical usage be authorized and reported to the Fort Lewis Installation Pest Manager. See also the response to comment FA2-2.

FA2-18 Section 4.6.1.2 has been revised to include additional information regarding long-term impacts on native grasslands on Fort Lewis.

FA2-19 Table 4.6.2-2 lists timing of life stages by basins rather than by individual waterbodies. The table includes the Nisqually Basin, in which both Muck Creek and South Fork Creek are located. Therefore, the timing of life phases included for the Nisqually Basin is assumed to apply to these two waterbodies.

FA2-20 Sections 4.3.2.3 and 4.6.2.3 have been revised to include Fort Lewis' stipulation that LWD from the military reservation cannot be removed unless authorized in writing by the Chief of the Forestry Branch of Public Works.

FA2-21 Sections 4.3.2.3, 4.6.2.4, and 4.7.1 and Appendix O have been revised to include bull trout presence in the Nisqually River.

FA2-22 Section 4.3.2.3 has been revised to include Fort Lewis' stipulation that Northwest identify and photograph all salmonids captured during construction across Muck Creek and South Fork Creek. See also the response to comment FA2-9.

FA2-23 Section 4.7 of the draft EIS included critical habitat descriptions from the most recent proposed and final rules for fish species with the potential to occur along the proposed loops as published in the Federal Register. No new rules changing the critical habitat designations have been published since those cited in the draft EIS. One notice was published extending the comment period for the proposed rule to designate critical habitat for bull trout, but this notice did not change the proposed designations.

FA2-24 Section 4.7.1 has been revised to incorporate the information on bald eagle communal roosts on Fort Lewis based on Fort Lewis Regulation 420-5.

FA2-24 (cont'd) *Species of Concern, and Designated Critical Habitat*, for the locations of winter communal roosts for bald eagles at Fort Lewis.

FA2-25 c) Page 4-134. Bald eagle nests occur at both Chambers Lake and Spanaway Marsh (in Pierce County). These nests should be included in the surveys for active nests.

FA2-26 d) Page 4-137. It is not appropriate to mitigate the loss of critical habitat on Fort Lewis by obtaining property or easements on land adjacent to Fort Lewis unless sufficient operation and maintenance funding is included.

FA2-27 e) Page 4-145. Surveys for the streaked horned lark will be conducted on Fort Lewis prior to construction that would occur during April through July.

7) Cultural Resources

FA2-28 a) Page 4-205. Reference the work conducted by Archaeological Investigations Northwest, Inc. on the homestead site located in Fort Lewis (unpublished report, Terry Ozbun 503 761-6605).

8) Appendix A: Draft EIS Distribution List

FA2-29 a) Page A-2. Federal Agencies, Department of the Army, WA: David Clouse works in the Environmental and Natural Resources Division and Lee Burnett works in the Planning Division.

9) Appendix E: FERC Staff's Upland Erosion Control, Revegetation, and Maintenance Plan

FA2-30 a) Page E-3, #11. Verify that all soils imported onto Fort Lewis are certified weed free (Inger Gruhn).
b) Page E-5, #2. The right-of-way (ROW) shall not exceed 75 feet at Fort Lewis due to sensitive habitat adjacent to the existing ROW.
c) Page E-7. Add additional maintenance requirement to section IV.F.2.: sediment levels shall not exceed 5 Nephelometric Turbidity Units above background at a point 100 feet downstream of the diversion structure.
d) Page E-8, #3. Do not apply fertilizer on Fort Lewis lands.
e) Page E-13, #5. Routine vegetation clearing in the Muck Creek and South Fork Creek crossings shall not occur between October and April.
f) Page E-13, letter B. All chemical usage (herbicides, pesticides, insecticides, etc.) must be authorized and reported (as pounds of active ingredient) to the Fort Lewis Installation Pest Manager.

10) Appendix F: FERC Staff's Wetland and Waterbody Construction and Mitigation Procedures

FA2-31 a) Page F-2. Fort Lewis shall be given a 14-day advanced notice of any work in and adjacent to Muck Creek and South Fork Creek (Deborah Johnston).
b) Page F-3, #1d and #1e. Fort Lewis has established wetland and waterbody buffers. See previous comment 2) a) i) above.
c) Page F-3, #1f. Concrete coating activities shall not occur within 50 meters of a wetland.
d) Page F-4. Add this additional requirement to the Waterbody Crossings section: Notification Procedures and Permits. Notify the Fort Lewis Range Division three

FA2-25 As discussed in section 4.7.1, Northwest would conduct additional aerial surveys before construction to determine the status of known nests and to identify any new nests. Therefore, it is expected that the referenced nests at Chambers Lake and Spanaway Marsh, if within the proposed area of effect associated with the project, would be identified during those surveys.

FA2-26 As discussed in section 4.7.1, Northwest would develop its proposed compensatory mitigation for effects on designated critical habitat for the northern spotted owl through consultation with the FWS and Fort Lewis. The FERC staff has recommended that Northwest file its final compensatory mitigation plan along with documentation of FWS and Fort Lewis concurrence with the plan (see also mitigation measure number 20 in section 5.4). Therefore, Northwest would be required to adhere to any stipulations identified by Fort Lewis, including any operation and maintenance funding requirements.

FA2-27 Section 4.7.2 has been revised to indicate that Northwest would survey for streaked horned larks before construction.

FA2-28 Section 4.10.1 has been revised to include the results of cultural resources evaluations that were completed at the homestead site after publication of the draft EIS.

FA2-29 The environmental mailing list and the distribution list in Appendix A have been corrected.

FA2-30 The intent of the FERC staff's Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) (Appendix E) is to assist applicants by identifying baseline mitigation measures for minimizing the extent and duration of disturbances on soils associated with projects under the FERC's jurisdiction throughout the country. Because these are standard guidelines issued by the FERC, the Plan cannot be changed on a project-specific basis.

Section 4.2.2 has been revised to state that Northwest would prepare a site-specific ECR Plan for Fort Lewis that would incorporate Fort Lewis' requirements regarding erosion control and restoration and would provide the plan to Fort Lewis for approval before construction on the military reservation. Section 4.5.2 has been revised to include information regarding reclamation/revegetation that would be included in Northwest's site-specific ECR Plan for Fort Lewis. The FERC staff expects that Fort Lewis will work with Northwest to ensure that all appropriate stipulations are included in the site-specific ECR Plan for Fort Lewis. The FERC staff has recommended in section 4.2.2 that the site-specific ECR Plan for Fort Lewis and documentation of Fort Lewis' concurrence with the plan be filed with the Secretary before construction on the military reservation (see also mitigation measure number 12 in section 5.4).

In addition, section 4.3.2.3 has been revised to include Fort Lewis' stipulation regarding downstream turbidity and vegetation maintenance at the Muck Creek and South Fork Creek crossings. Section 4.5.2 has been revised to include information regarding Fort Lewis' reclamation/revegetation requirements. See also the responses to comments FA2-2 and FA2-9.

FA2-31 The intent of the FERC staff's Procedures (Appendix F) is to assist applicants by identifying baseline mitigation measures for minimizing the extent and duration of disturbances on wetlands and waterbodies associated with projects under the FERC's jurisdiction throughout the country. Because these are standard guidelines issued by the FERC, the Procedures cannot be changed on a project-specific basis.

Section 4.2.2 has been revised to state that Northwest would prepare a site-specific ECR Plan for Fort Lewis that would incorporate Fort Lewis' requirements regarding erosion control and restoration and would provide the plan to Fort Lewis for approval before construction on the military reservation. Section 4.3.1.2 has been revised to discuss Fort Lewis' requirements regarding the location of construction laydown areas, vehicle parking areas, and refueling sites as well as its stipulations regarding concrete coating activities and the discharge of residue from concrete truck washing or cleanup activities. In section 4.2.3, the FERC staff has recommended that Northwest prepare a revised SPCC Plan for activities on Fort Lewis. Section 4.3.2.3 has been revised to include Fort Lewis' stipulations regarding turbidity limits and advanced notice for work in and adjacent to Muck and South Fork Creeks.

Sections 4.4.3 and 4.5.2 have been revised to include Fort Lewis' stipulations regarding wetlands and reclamation/revegetation requirements. See also the responses to comments FA2-2, FA2-5, and FA2-9.

The FERC staff expects that Fort Lewis will work with Northwest to ensure that all appropriate stipulations are included in the site-specific ECR Plan for Fort Lewis and the revised SPCC Plan. The FERC staff has recommended that the site-specific ECR Plan for Fort Lewis, the revised SPCC Plan, and documentation of Fort Lewis' concurrence with the plans be filed with the Secretary before construction on the military reservation (see also mitigation measure numbers 12 and 13 in section 5.4).

FA2-31 (cont'd)

months in advance of the start of construction to adequately ensure these activities do not conflict with military training exercises (Del Larson 253 967-155).

e) Page F-4, Section V.B.2.a. All work must be in compliance with Fort Lewis regulation 420-5.
f) Page F-4, Section V.B.2.b. Provide justification to Fort Lewis for work areas less than 50 meters from water's edge, as the areas adjacent to the proposed crossings are sensitive habitats (Deborah Johnston).
g) Page F-7. Add this requirement to section V.B.6.c. "Maintenance requirement that sediment levels shall not exceed 5 Nephelometric Turbidity Units above background at a point 100 feet downstream of the diversion structure."
h) Page F-10, C.1. Apply wetland buffer conditions as specified in comment 2) a) i) above.
i) Page F-10, C.6. Only native plant material will be used on Fort Lewis.
j) Page F-10. Add new restoration requirement, C.9: "If hardened crossings on Fort Lewis are damaged, they must be restored to pre-construction conditions."
k) Page F-10. Add new post-construction maintenance requirement, D.3. "All chemical usage (herbicides, pesticides, insecticides, etc.) must be authorized and reported (as pounds of active ingredient) to the Fort Lewis Installation Pest Manager" (Deborah Johnston).
l) Page F-15, C.5. Annual ryegrass will not be applied on Fort Lewis.
m) Page F-15, D.2. All chemical usage (herbicides, pesticides, insecticides, etc.) must be authorized and reported (as pounds of active ingredient) to the Fort Lewis Installation Pest Manager.
n) Page F-16 to F-17. Although the maps in Appendix B show that hydrostatic testing will not occur on Fort Lewis and page 2-21 indicates that water for hydrostatic testing on the Fort Lewis Loop would be obtained from the Centralia Canal, it is important to state that water from Muck and South Fork Creeks shall not be used for hydrostatic testing unless authorized by Fort Lewis.

11) Appendix G: Erosion Control and Revegetation Plan for the Capacity Replacement Project

FA2-32

a) Page G-9, Section 3.1.4. Mulch or fertilizer will not be applied on Fort Lewis.
b) Page G-11. Section 3.1.9. Apply wetland buffer conditions as specified in comment 2) a) i) above.
c) Page G-15, Section 7.2. Construction debris disposal shall be coordinated with the Forestry Branch Chief.
d) Page G-17, Section 7.8. Fertilizer use is not authorized on Fort Lewis.
e) Page G-17 to -18. Seeding mixtures in forested areas of Fort Lewis shall comply with the Forestry Management Plan unless authorized in writing from the Forestry Branch Chief (Allan Derickson).

12) Appendix H: Spill Prevention, Containment, and Countermeasures Plan for the Capacity Replacement Project

FA2-33

a) Page H-4. Concrete truck washing and clean-up residue must not be discharged on Fort Lewis.

FA2-32 See the responses to comments FA2-30 and FA2-31.

FA2-33 Sections 4.2.3 and 4.3.1.2 have been revised to include Fort Lewis' stipulations regarding replacement soils and release notification requirements and the discharge of residue from concrete truck washing or cleanup activities. In section 4.2.3, the FERC staff has recommended that Northwest file a revised SPCC Plan for activities on Fort Lewis and documentation of Fort Lewis' concurrence with the plan be filed with the Secretary before construction on the military reservation (see also mitigation measure number 13 in section 5.4).

FA2-33 (cont'd)

b) Page H-6. Fort Lewis shall be notified of all releases of hazardous material/waste not limited to concrete, bentonite, etc. (Please call Emergency Response 911 for all spills).
c) Page H-11. Soils contaminated as a result of spills shall be removed from the ROW and replaced with clean soils. The clean soils shall not have analyte levels above the recommended Threshold Effects Levels described in the NOAA Screening Quick Reference Tables (SQuiRT).

If you have any questions, please call Hibba Wahbeh, Anteon Corporation, 253-966-1779.

Sincerely,

Paul T. Steucke Jr.
Chief, Environmental and Natural Resources Division

Fort Lewis NEPA Log #: 04-069

200504255023 Received FERC OSEC 04/25/2005 01:54:00 PM Docket# CP05-32-000, ET AL.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

April 22, 2005

Reply To
Attn Of: ETPA-088 Ref: 04-041-FRC

Magalie R. Salas, Secretary
Attn: Gas Branch 2, OEP/DG2E
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Dear Ms. Salas:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the **Northwest Pipeline Corporation Capacity Replacement Project** (CEQ No. 20050084) in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. The draft EIS analyzes approximately 16 different alternatives in response to an amended Corrective Action Order from U.S. Department of Transportation requiring abandonment of an existing 26-inch natural gas pipeline that runs 286 miles from Sumas to Washougal counties in Washington State.

The preferred alternative will construct four (4) loops totaling 79.5 miles of pipeline along an existing pipeline right-of-way in the Interstate 5 corridor to replace capacity of the existing 26-inch pipeline that is to be abandoned. Alternatives considered include a range of system alternatives, abandonment alternatives, various alternative pipeline configurations, and construction method alternatives.

EPA has assigned a rating of EC-2 (Environmental Concerns, Insufficient Information) due to environmental concerns regarding certain aspects of the project that are identified but not fully described in the draft EIS. The draft EIS identifies important project details that will be provided during the course of various permit application processes, which were not complete as of the writing of the draft EIS. These additional project details are critical to ensuring that all appropriate measures are taken to avoid, reduce or mitigate impacts through the use of best management construction practices, and compensatory mitigation where necessary.

Although EPA has concerns that should be addressed in the final EIS, EPA has reviewed the draft EIS and has no objections to the project's preferred alternative. While this project will result in significant environmental impacts, the draft EIS provides a reasoned explanation for selection of the preferred alternative over the other alternatives presented (e.g., full replacement of pipeline, or alternate pipeline routes). The draft EIS also identifies the rationale for the selection of stream crossing techniques that will present the least environmental impact to the 146 water bodies that must be crossed. Analysis of air and noise impacts from modifications to

the five compressor stations indicate that no regulatory limits will be exceeded based on modeled predictions. Based on the analysis presented, EPA supports the preferred alternative presented in the draft EIS.

To address EPA's concerns, we recommend that critical project elements be discussed in greater detail, where possible, in the final EIS including: selection of compensatory mitigation, implementation of the project-specific erosion control plan, and discussion of significant localized impacts.

EPA is enclosing our comments and recommendations on the draft EIS for your consideration. EPA welcomes any suggestions you may have on how we can constructively work with FERC in the future in fulfilling EPA's NEPA review responsibilities. If you have any questions, you may contact Peter Contreras, of my staff, at (206) 553-6708.

Sincerely,

/S/

Christine Reichgott, Manager
NEPA Review Unit

EPA Comments
Draft EIS Capacity Replacement Project
Northwest Pipeline Corporation (FERC/EIS - 0178D)
Docket Nos. CP05-32-000, -001

Selection of Compensatory Mitigation

FA3-1 Compensatory mitigation is identified as necessary for permanent impacts associated with the compressor station modifications, and with significant temporary impacts to water bodies, wetlands, and forested habitats. (draft EIS, Section 4.4.4). EPA supports the use of mitigation ratios as reflected in Table 4.4.4-1. Because a mitigation plan has not been prepared, EPA is not able to assess whether the environmental impacts will be adequately mitigated. EPA supports FERC staff's recommendation (p.4-90) that the final EIS provide a conceptual mitigation plan. EPA recommends that the mitigation plan provide additional detail on the amount of acres and type of mitigation — preservation, restoration, or a combination thereof — that will be provided. EPA also recommends that the final EIS emphasize the commitment to specific performance standards, adaptive management and corrective action to ensure that lost habitat functions are replaced.

In a recent report, FERC determined that success rates are 37% for mitigation projects in the arid west (*see* Research of Wetland Construction and Mitigation Activities for Certification Section 7(c) Pipeline Projects, Federal Energy Regulatory Commission, Office of Energy Projects, March 1994.) Although no data is provided for the "marine division" as defined in the FERC report, EPA notes that the draft EIS identifies portions of the action area as "droughty conditions" (page 4-24). EPA recommends that special emphasis be given in the final EIS, ROD and subsequent requirements of FERC for the pipeline certification, to ensure that Northwest be required to ensure a specified success rate for specific performance standards (e.g., 80% vegetative cover of specified plantings by a specified date) to be demonstrated by monitoring reported to agencies with jurisdictional oversight (FERC, Ecology, Corps). For example, EPA supports FERC's oversight requiring monitoring and reporting to FERC on restoration results following water body crossings as specified in Appendix F (F-15 @ D.3 & D.4).

FA3-2 EPA Region 10 requests a copy of the draft and final compensatory mitigation plans (Attn: Krista Rave-Perkins/ARU), and that EPA's Aquatic Resources Unit be included in notices and discussions pertaining to the development of a compensatory mitigation plan that will be approved by the U.S. Army Corps of Engineers and the Washington State Department of Ecology pursuant to applicable permits.

Project-specific Erosion Control Plan

FA3-3 Appendices F and G provide FERC's Wetland and Waterbody Construction and Mitigation Procedures (2003) and Williams' Erosion Control and Revegetation Plan for the Capacity Replacement Project (November 2004). These plans are important elements in ensuring that impacts during construction are successful. To improve the effectiveness of these plans, EPA recommends that additional detail be provided for the elements detailing the role of the Environmental Inspector (EI). Page F-2 at III, and G-6, bullet 1: Explain why one EI per loop is sufficient (if one loop is approximately 11 to 22 miles). Will work be occurring across

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FA3-1 Section 4.4.2 has been revised to address performance standards and adaptive management strategies for revegetation in wetlands. Section 4.4.4 has been revised to include additional details and information on Northwest's compensatory wetland mitigation plan. The revised section 4.4.4 includes the FERC staff's recommendation that Northwest continue consultations with the applicable agencies and Native American tribes and file the final compensatory wetland mitigation plan with the Secretary before construction (see also mitigation measure number 18 in section 5.4). Section 4.4.4 also explains how the public and other agencies can view the final plan once it is filed.

FA3-2 In a filing submitted after the close of the comment period on the draft EIS, Northwest stated that copies of the draft compensatory mitigation plans have been provided to Krista Rave-Perkins per the U.S. Environmental Protection Agency's (EPA) comment letter. These mitigation plans have not yet been finalized.

Northwest is in the process of consulting with other federal, state, and local agencies and applicable Native American tribes to finalize its waterbody crossing and compensatory wetland mitigation requirements. The FERC staff understands that the EPA has been involved in these consultations, including a November 29, 2004 meeting between Northwest, the COE, the WDOE, and the WDFW. Section 4.3.2.3 has been revised to include the FERC staff's recommendation that Northwest continue consultations with the applicable agencies and Native American tribes and file the final site-specific waterbody crossing plans and final Mitigation Plan for Waterbody Crossings with the Secretary for the review and written approval of the Director of OEP before construction at each applicable waterbody (see also mitigation measure number 17 in section 5.4). These final plans may incorporate new information that may become available as Northwest continues consultations with the COE, the WDOE, the WDFW, various county agencies, and Native American tribes. The FWS and NOAA Fisheries may impose additional mitigation as well as part of their Biological Opinions (see section 4.7) that also should be included in Northwest's Mitigation Plan for Waterbody Crossings. The FERC staff believes these continued consultations will result in the development of acceptable site-specific crossing plans and mitigation requirements for the waterbodies that would be crossed by the Capacity Replacement Project. Section 4.3.2.3 also explains how the public and other agencies can view the final plans once they are filed.

Section 4.4.4 has been revised to include the FERC staff's recommendation that Northwest continue consultations with the applicable agencies and Native American tribes and file the final compensatory wetland mitigation plan with the Secretary before construction (see also mitigation measure number 18 in section 5.4). Section 4.4.4 also explains how the public and other agencies can view the final plan once it is filed.

The EPA's Aquatic Resources Unit (Krista Rave-Perkins) is on the FERC's environmental mailing list for the project and will receive additional notices issued to the public and other agencies by the FERC. The FERC staff

FA3-2 (cont'd) suggests that the EPA submit a direct request to the COE and the WDOE to be included in additional COE and WDOE notices and discussions regarding the final waterbody and wetland mitigation plans.

FA3-3 Section 2.5 states that at least one full-time environmental inspector (EI) would be present on each construction spread. Section 2.5 also discusses the FERC staff's recommended mitigation measure number 6 (see section 5.4), which requires Northwest to submit an Implementation Plan for approval prior to the commencement of construction. The Implementation Plan must identify the number of EIs assigned per spread and describe how Northwest will ensure that sufficient personnel are available to implement the environmental mitigation. When the FERC staff reviews the Implementation Plan, it will consider the number and qualifications of the EIs identified by Northwest and determine whether they are appropriate for this project. If the FERC staff finds that the environmental inspection plan is not sufficient, the Director of OEP may be advised to either require a change in the number of EIs or individual personnel.

Section 2.5 has been revised to describe the third-party compliance monitoring program that would be implemented by the FERC during construction of the project. Under this program, full-time third-party compliance monitors would be present on the construction spreads to monitor and document compliance with project mitigation measures and requirements. During construction, the third-party compliance monitors would conduct daily ongoing inspections of construction activities and mitigation measures and provide regular feedback on compliance issues to the FERC, Northwest, and other applicable agencies. The FERC staff would also conduct periodic inspections of the project for compliance with the Commission's environmental conditions.

Section 2.3.1 describes the specific activities that make up the linear construction sequence. Pipeline construction is similar to an assembly line, with crews conducting separate but sequential activities, each generally proceeding at rates ranging from several hundred feet to 1 mile per day. Many factors influence how far these crews become "spread out" during construction. Typically, activities are spread over a distance of several miles.

If the FERC determines at any time during construction that Northwest does not have sufficient personnel on the construction spreads to implement the required environmental mitigation, the FERC would require Northwest to increase its environmental inspection personnel.

FA3-3 (cont'd) the full 20-mile loop simultaneously, or will work be limited to a single crew at a given point in time? Will one person be able to address all of the requirements specified for in-field determinations of erosion control, water quality/turbidity monitoring associated with horizontal direction drilling (*see* HDD 1-10, G-6) and other requirements? These questions should be answered in the final EIS at page G-6.

FA3-4 EPA notes that FERC recommendation number 6.b. (p.5-6) requires an Implementation Plan that would require Northwest to provide this information at least 60 days before the start of construction. EPA supports this requirement, and believes a brief synopsis of this plan regarding the rationale for the number of EIs would be appropriate to include in the final EIS.

Discussion of Significant Localized Impacts

FA3-5 It is not clear from the draft EIS that all reasonable efforts have been made to avoid localized impacts from temporary disturbances associated with equipment storage and mobilization activities. Reported information from FERC's public hearing on April 12, 2005, indicates that significant, legitimate concerns are being raised by affected property owners that merit consideration:

> "Wendy Walsh, who owns 60 acres in Woodinville under permanent conservation easements, said Williams wants to use a portion of her property to the west of the pipeline to store its equipment during the construction.
>
> The problem is that part of her land is heavily forested and is prime breeding habitat for barred owls, she told the room." and,
>
> "One Sammamish resident, Tim Gray, pointed out that his immediate neighborhood is served by a community well surrounded by heavy woodlands. Williams picked the area immediately around the well for vehicle and equipment storage and wants to remove about 87 trees there." (Pipeline Neighbors Say Company Isn't Doing Its Homework, 2005-04-15, by Chris Winters, King County Journal).

EPA recommends that the final EIS be modified to require all temporary staging areas for equipment, and other work space be done in open areas that do not require destruction of forest or other slow-recovering habitat, particularly in areas where there are existing conservation easements. The local importance of wildlife corridors should also be reconsidered, where property owners provide practicable alternative suggestions. The final EIS should provide a justification for each area where it is not technically feasible or practicable to utilize open areas for temporary work space, where an affected landowner or other knowledgeable party suggests a workable alternative.

Miscellaneous Comments

FA3-6 • EPA supports FERC staff recommendations (*see* p. 4-237) that all reasonable efforts should be taken to assure its predicted noise levels are not exceeded at nearby noise-sensitive areas (NSAs) and that the recommended reporting and corrective actions

FA3-4 See the response to comment FA3-3.

FA3-5 Section 4.8.4 has been revised to include a discussion of the conservation easement (referred to as the Walsh-Weber Sanctuary) that would be crossed by the Capacity Replacement Project. Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision and alternatives to the proposed access road and temporary extra workspaces. See also the response to comment PM2-9.

FA3-6 Comment noted.

FA3-6 (cont'd) measures should be taken by Northwest to implement noise reduction measures for the compressor station modifications.

FA3-7 • EPA notes that no conceptual diagram is provided for the push-pull method (*see* p.2-35). EPA recommends adding a diagram similar to that provided for other methods for clarity.

FA3-8 • Figure 4.12.1-1, High Consequence Areas Along the Northwest System and Appendix B, Facility Location Maps provide a graphical representation of the locations of the four loops, general topography and water bodies. In addition, it would be helpful in disclosing the extent of environmental impacts to have a map for each loop that includes main water bodies, residential areas, pipeline lay out, roads and other key contextual information (cities, counties) in a GIS-based, Auto-CAD, annotated areal photo or equivalent mapping/software format to graphically display the extent of impacts in the context of local watershed and residential neighborhoods, as a companion to the extensive tabulated information on wetlands & water body crossing information. Providing additional maps would be consistent with FERC's commitment to meet the NEPA objective of public disclosure to allow more localized impacts to be understood by the affected communities.

FA3-9 • HDD Drilling method. Please clarify whether the HDD and bore drilling methods will consider the hyporheic zone beneath designated water body crossings where important ground-water and surface water exchange occurs that support functions for a healthy river system (*see* http://depts.washington.edu/cwws/Outreach/FactSheets/hypo.pdf). EPA recommends that the drill path be directed beneath the hyporheic zone if it is technically practicable to do so.

FA3-7 Section 2.3.2 has been revised to include a typical diagram for the push-pull crossing method (see figure 2.3.2-5).

FA3-8 Northwest has prepared aerial photo-based Environmental Construction Alignment Sheets that depict the location of the proposed loops, the limits of the permanent easement and construction right-of-way, roads, residential areas, wetlands, and waterbodies. These alignment sheets are too voluminous to include in this EIS. They are available for public inspection at the FERC's Public Reference Room in Washington, DC (call (202) 502-8317 for instructions) and at the WDOE's regional offices. Residents in Whatcom, Skagit, Snohomish, or King Counties can access these documents at the WDOE's Northwest Regional Office in Bellevue by calling the Public Disclosure Coordinator at (425) 649-7190 or (425) 649-7239. Residents in Pierce, Thurston, Lewis, Cowlitz, or Clark Counties can access these documents at the WDOE's Southwest Regional Office in Lacey by calling the Public Disclosure Coordinator at (360) 407-6365.

FA3-9 The proposed HDDs would be between 60 and 100 feet below the streambed and, therefore, well below the hyporheic zone. Northwest does not propose to cross any waterbodies using the bore method.